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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

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Keith Raniere,

Plaintiff,

- v -

Case No. 4:22-cv-00561-RCC

Merrick Garland, et. al.,

Defendants.

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**MOTION TO REQUEST EXTENSION OF DEADLINE
TO FILE RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

1. Plaintiff Keith Raniere, through his undersigned counsel, hereby moves to request the Court for an order granting a reasonable extension of the deadline to submit a Response in Opposition to Defendants' Motion for Summary Judgment related to the above-captioned case, which was due on November 16, 2023, to January 19, 2024 or any date thereafter that the Court deems acceptable.

2. Mr. Raniere's incarceration poses logistical challenges to enable him to easily participate with our office in the drafting of his response. To that end, although we continue to make attempts to contact Mr. Raniere to discuss a draft of our Response, we find it very difficult to reach and communicate with our client. At this time, we have not yet had sufficient time and opportunity to discuss its contents in its entirety with him. We feel it is imperative to

do so before filing. As such, we are requesting an additional adjournment to file our Response.

3. This extension is sought to afford additional time for the undersigned counsel to engage in consultation with Plaintiff regarding the filing of his Response. Although this is the fourth request by the undersigned counsel on behalf of Plaintiff for an extension to file a Response in Opposition to Defendants' Motion for Summary Judgment, we feel it necessary considering his current circumstances and the difficulties they pose to facilitating attorney-client communication.

4. We were informed that Mr. Raniere has been placed in involuntary protective custody and have only been able to speak with him one time since November 1, 2023. We therefore, have not had adequate access or time to discuss the case with him. Additionally, due to the recent stabbing of Derek Chauvin that has taken place in this facility, we anticipate it will be even more difficult to get access to Mr. Raniere in the coming weeks. Therefore, the undersigned counsel respectfully requests the Court for a reasonable extension to file the Response.

5. We have conferred with counsel for the Defendants, and they do not oppose Plaintiff's request for an extension, and consent to the requested date of January 19, 2024.

6. Based on the foregoing, Plaintiff respectfully requests the date to file his Response in Opposition to Defendants' Motion for Summary Judgment be extended to January 19, 2024, or any date thereafter that the Court deems convenient.

Date: November 28, 2023

Respectfully submitted,

/s/ Arthur L. Aidala
Arthur L. Aidala, Esq.
Attorney for Plaintiff

Delivered via ECF
to all Registered Parties